

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF PUERTO RICO**

IN RE:

JUAN CARLOS BALCELLS GALLARETA

Debtor

CASE NO. 11-06637 (MCF)

CHAPTER 7

**NOREEN WISCOVITCH RENTAS
CHAPTER 7 TRUSTEE**

Plaintiff

v.

AMARILIS GONZÁLEZ GARCÍA

Defendant

ADV. NO. 14-00137

OPPOSITION TO MOTION REQUESTING ORDER TO COMPEL

TO THE HONORABLE COURT:

COMES NOW defendant, Amarilis González García (“Defendant”), through the undersigned attorney, and respectfully STATES and PRAYS:

1. On March 27, 2018, Plaintiff sent an email to Defendant’s counsel with a copy of the Plaintiff’s discovery request, which included interrogatories and request for the production of documents (the “Discovery Request”). Defendant’s counsel stated at that time that no previous discovery requests were received by Defendant and that the Discovery Request was to be answered within the time period prescribed by the Federal Rules of Civil Procedure, as made applicable by the Federal Rules of Bankruptcy Procedure.

2. On April 25, 2018, within the time period prescribed to answer the Discovery Request, Defendant mailed its answers to the Discovery Request (the “Answers”) to Plaintiff by certified mail to the following address:

Rafael González Valiente, Esq.
P.O. Box 9024176
San Juan, PR 00902-4176

3. The Answers were delivered and received by Rafael González Valiente, Esq., on April 27, 2018 (**EXHIBIT 1**).

4. On that same day, Plaintiff filed a motion requesting this Honorable Court to issue an order compelling Defendant to respond the discovery request sent by Plaintiff (the “Motion to Compel”).

5. Since Defendant has already answered the Discovery Request, Defendant’s Motion to Compel is moot.

WHEREFORE it is very respectfully requested that this Honorable Court deny the Motion to Compel.

RESPECTFULLY SUBMITTED.

San Juan, Puerto Rico, this 8th day of May, 2018.

I HEREBY CERTIFY that on this same date I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the participants appearing in said record, including the Debtor and Chapter 7 Trustee.

NOTICE

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the clerk’s office of the United States Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the court, the interest of justice requires otherwise.

s/ CARLOS G. GARCÍA MIRANDA
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